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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JAN - 3 1997

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,) RM-
FM Broadcast Stations)
(Chewelah, Washington))

DOCKET FILE COPY ORIGINAL

TO: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULEMAKING

LifeTalk Broadcasting Association ("LifeTalk"), by counsel and pursuant to Section 1.401 of the Commission's rules, hereby petitions the Commission to initiate a rulemaking proceeding to amend the FM Table of Allotments in Section 73.202(b) of the Commission's rules so as to allot FM Channel 283C3 to Chewelah, Washington, and to reserve that channel exclusively for noncommercial use. In support whereof, the following is respectfully stated.

Submitted herewith as Exhibit 1 is an engineering study which shows that, subject to a site restriction, Channel 283C3 can be allotted to Chewelah in compliance with the separation criteria of Section 73.207 of the Commission's rules.

The reference coordinates for the proposed allotment used in this petition are north latitude 48-19-30 and west longitude 117-51-30. A site restriction of four kilometers north-northwest of Chewelah will be necessary for this allotment in order to protect station KEEH, on Channel 284A at Spokane. A service contour map in Exhibit 2 demonstrates that a station

operating from the proposed reference site could provide city-grade service (within the 70 dBu or 3.16 mV/m contour) to the community of license, Chewelah.

Chewelah is an incorporated town in Stevens County, Washington located on U.S. Route 395, approximately 50 miles north of Spokane. The population of Chewelah in 1990 was reported by the Census Bureau to be 1,945. No broadcast station is presently licensed to the community and no vacant broadcast channel is allotted there. Chewelah meets the Commission's standards for a community which qualifies to receive an FM allotment.

LifeTalk is a nonprofit entity and the station it ultimately hopes to establish at Chewelah will offer a noncommercial broadcast service. If a reserved noncommercial frequency were available at Chewelah, LifeTalk would apply to construct its station on that channel. Exhibit 3 contains information to demonstrate that openings for new stations on reserved band Channels 206 and 212 do exist which could serve Chewelah. However, such applications are precluded by the proximity of television Channel 6, KHQ-TV, at Spokane. The distance from the KHQ-TV transmitter site to Chewelah is 85 kilometers. This distance places Chewelah within the protected area for Channel 6 required by Section 73.525(a) of the Commission's rules. The minimum distance for protecting Channel 6 by an FM station is 154 kilometers for an FM station on Channel 220. The required distance increases for FM stations on lower frequencies. Accordingly, operating a new station on a reserved

FM channel in the Chewelah area simply would not be feasible.

In situations such as this, Commission precedent permits the reservation of a channel on the nonreserved portion of the FM band for noncommercial use. Butte, Montana, 9 F.C.C.Rcd. 2180 (MMB 1994); Buhl, Montana, 9 F.C.C.Rcd. 2606 (MMB 1994); Romney, West Virginia, 11 F.C.C.Rcd. 12800 (MMB 1996).

If the Commission allots the requested channel to Chewelah, LifeTalk will promptly file an application for authority to construct a new station there. If that application is granted, LifeTalk will promptly construct the new station and initiate a new broadcast service for Chewelah and the surrounding area.

In accord with the foregoing, LifeTalk proposes that the FM Table of Allotments, Section 202(b) of the Commission's rules, be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Chewelah, Washington	---	*283C3

WHEREFORE, LifeTalk Broadcasting Association respectfully urges the Commission to initiate a rule making proceeding to adopt the above-identified proposal, allotting Channel 283C3 to Chewelah, Washington and reserving it exclusively for noncommercial use.

Respectfully submitted,

LIFETALK BROADCASTING ASSOCIATION

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EXHIBIT 1

01-03-1997

LIFE TALK BROADCASTING ASSOCIATION

509 248-TALK

CH# 283C3 - 104.5 MHz

WACHWELA

INTERFERENCE CHECKS WITH TBA, CHEWELAH, WA at N. LAT. 48 19 30 W. LNG. 117 51 30

PWR = 25 kW H.A.A.T. = 100 M

Protected F(50-50) 60 dBu = 39.08 km

F(50-10) 40 dBu = 113.63 54 dBu = 60.17 80 dBu = 12.86 100 dBu = 4.06

F(50-10) 37 dBu = 130.53 51 dBu = 69.73 77 dBu = 15.58 97 dBu = 4.89

F(50-10) 34 dBu = 146.27 48 dBu = 80.19 74 dBu = 19.19 94 dBu = 5.84

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kW)	INT(km)	PRO(km)
CITY	STATE	LICENSEE				LNG.	HAAT(M)	COR(M)	FILE #	

281B	AL281	AL	84.0 R	3.0 M	7.7	86.97 km	49 06 00	50.00	19.95	65.06
Trail	BC		187.7	54.04 Mi		117 42 00	150.0	0		

282C2	ALOPEN	AL N	117.0 R	7.4 M	266.8	124.45 km	48 15 44	50.00	78.11	52.20
Omak	WA 93-319	WO=	941	86.8	77.33 Mi	119 31 58	150.0	0		
FCC Comment > Accepted by Canada on 940201										
Site Restricted-Effective 12-5-94										

282C2	AP282	AP ZCN	117.0 R	19.8 M	270.1	136.78 km	48 19 35	50.00	78.11	52.20
Omak	WA Northcentral Broadcasting		90.1	84.99 Mi		119 42 10	150.0	930	BPH950105MD	

282C2	AP282	AP ZCN	117.0 R	7.6 M	269.7	124.59 km	48 19 12	3.50	60.97	40.94
Omak	WA John P. Andrist		89.7	77.42 Mi		119 32 18	299.0	917	BPH950103MA	
FCC Comment > Amended 960216										
73.215 Application										
Proposed as Class B to Canada 960726-Specially negotiated, short-spaced										
allotment-Accepted by Canada 961016										

284C	CHIMFM	OP DHN	195.0 R	5.4 M	323.2	200.41 km	49 46 06	36.00	67.81	44.38
Kelowna	BC		143.2	124.53 Mi		119 29 59	115.0	0		

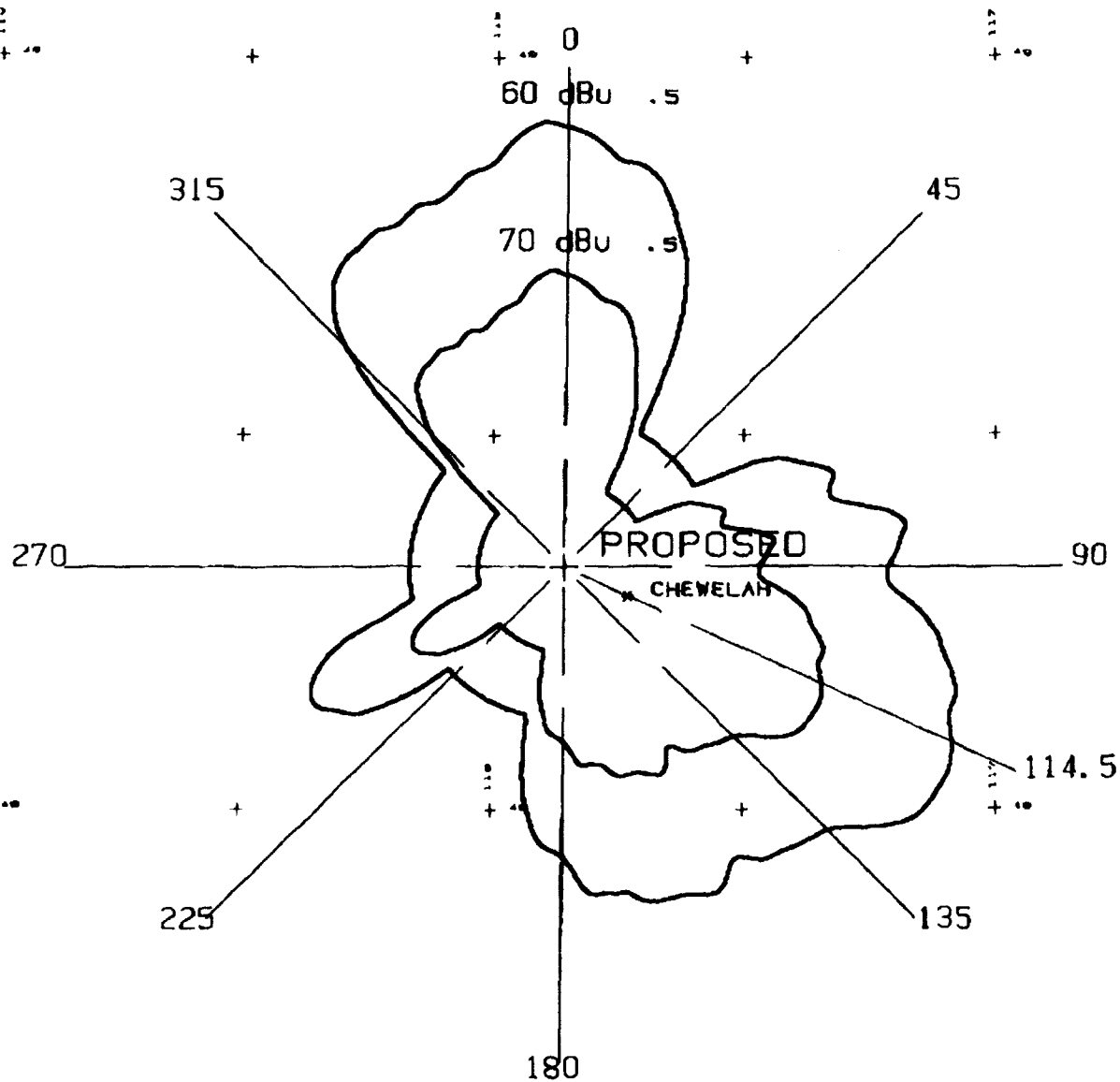
284C	AO284	AL	195.0 R	11.5 M	52.3	206.51 km	49 27 34	100.00	136.57	91.82
Cranbrook	BC		232.3	128.32 Mi		115 37 44	600.0	0		
FCC Comment > Specially negotiated, short-spaced allotment										

284A	KEEH	LI CN	89.0 R	3.9 M	153.2	92.94 km	47 34 45	0.32	43.38	28.06
Spokane	WA Sunbrook Communications Co		333.2	57.75 Mi		117 17 48	420.0	1138	BLH930629KB	
FCC Comment > Proposed as B1 to Canada on 920306-Accepted by Canada 920602-Specially negotiated short spaced allotment.										

284C	AL284	AL	195.0 R	11.5 M	52.3	206.51 km	49 27 34	100.00	136.57	91.82
Cranbrook	BC		232.3	128.32 Mi		115 37 44	600.0	0		
FCC Comment > Specially negotiated, short-spaced allotment-Accepted by Commission 940902										

i.f. RELATIONSHIPS: NONE FOUND

EXHIBIT 2



1: 1,000,000

Scale in km

PROPOSED 283C3 25kW HAAT 100m

WACHWELA RM

N. Lat. 48 19 30

W. Lng. 117 51 30

LTBA

EXHIBIT 3

01-03-1997

LIFE TALK BROADCASTING ASSOCIATION

509 248-TALK

CH# 206C3 - 89.1 MHz

WACHWELA

INTERFERENCE CHECKS WITH TBA, CHEWELAH, WA at N. LAT. 48 17 10 W. LNG. 117 43 47

PWR = 25 kW H.A.A.T. = 100 M

Protected F(50-50) 60 dBu = 39.08 km

F(50-10) 40 dBu = 113.63 54 dBu = 60.17 80 dBu = 12.86 100 dBu = 4.06

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kW)	INT(km)	PRO(km)
CITY	STATE	LICENSEE			<---	LNG.	HAAT(M)	COR(M)	FILE #	

203A	AL203	AL	54.0 R	39.7 M	338.5	93.74 km	49 04 13	6.00	2.75	28.29
Christina Lake	BC				158.5	58.25 Mi	118 11 48	100.0	0	

204A	KAGU	LI VN	32.0	54.4	160.4	72.93 km	47 40 06	0.10	1.82	5.64
Spokane	WA	Gonzaga University			340.4	45.32 Mi	117 24 05	0.0	608	BLED870914KD
FCC Comment > VERTICAL POLARIZATION ONLY										

206C	KFAEFM	LI EN	50.6	78.0	204.5	267.68 km	46 05 43	100.00	178.04	76.08
Richland	WA	Washington State Universit			24.5	166.33 Mi	119 11 41	350.0	695	BLED821004BF

208C1	KEWUFM	LI CN	23.1	14.3	157.7	85.05 km	47 34 43	10.00	22.88	57.88
Cheney	WA	Eastern Washington Univers			337.7	52.85 Mi	117 17 50	429.0	1148	BLED861117KA
FCC Comment > SPEC NEGTD SHORT SPACED ALLOC-LTD TO 100 KW @ 340 M.										

208A	CBUDFM	OP DCN	62.0 R	71.5 M	7.6	133.49 km	49 28 33	0.22	2.20	6.83
Bonnington Falls	BC				187.6	82.95 Mi	117 29 16	-397.0	0	

i.f. RELATIONSHIPS:

260C	KXLYFM	LI CN	31.0 R	30.2 M	131.4	61.23 km	47 55 18	37.00	11.06	91.90
Spokane	WA	Spokane Radio, Inc.			311.4	38.05 Mi	117 06 48	914.0	1813	BLH901129KA

- Nearest CH 6 Grade B =KHQTV at-44.65 km

CH# 212C3 - 90.3 MHz

WACHWELA

INTERFERENCE CHECKS WITH TBA, CHEWELAH, WA at N. LAT. 48 17 10 W. LNG. 117 43 47

PWR = 25 kW H.A.A.T. = 100 M

Protected F(50-50) 60 dBu = 39.08 km

F(50-10) 40 dBu = 113.63 54 dBu = 60.17 80 dBu = 12.86 100 dBu = 4.06

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR(kW)	INT(km)	PRO(km)
CITY	STATE	LICENSEE			←	LNG.	HAAT(M)	COR(M)	FILE #	

211C1 AP211 AP CN 20.1 28.2 290.0 148.71 km 48 44 37 3.00 89.51 60.38
 Omak WA Washington State University 110.0 92.40 Mi 119 37 16 749.0 1595 BPED960325MB
 FCC Comment > Proposed as Class C1 to Canada 960716-Specially negotiated, short-spaced
 allotment limited to (a) 3kw ERP and 1050m HAAT or the equivalent along the
 2.8 degree azimuth towards channel 209C in Kelowna, BC; (b) 2kw ERP and 379m
 HAAT or the equivalent along the 287.5 degree azimuth towards channel 211A
 in Chilliwack, BC; (c) 3kw ERP and 1330m HAAT or the equivalent along the
 327.5 degree azimuth towards channel 211A in Spences Bridge, BC; (d) 3kw
 ERP and 1019m HAAT or the equivalent along the 38.6 degree azimuth toward
 channel 211A in Nakusp, BC-Accepted by Canada 960918

214A	AL214	AL	62.0 R	79.6 M	1.9	141.56 km	49 33 30	6.00	9.10	28.29
Vallican	BC		181.9	87.96 Mi		117 40 00		100.0	0	

i.f. RELATIONSHIPS:

266C	KEYFFM	LI CN	31.0 R	52.3 M	157.2	83.34 km	47 35 42	100.00	13.69	91.78
Cheney	WA	Pourtales Radio Partnershi	337.2	51.79 Mi		117 17 53		599.0	1298	BLH891004KB

266C	KEYFFM	CP CN	31.0 R	52.6 M	157.2	83.59 km	47 35 35	100.00	12.49	86.11
Cheney	WA	Pourtales Radio Partnershi	337.2	51.94 Mi		117 17 46		490.0	1196	BPH940714IZ

266C	KEYFFM	AP DHN	31.0 R	52.6 M	157.2	83.59 km	47 35 35	1.25	2.34	39.90
Cheney	WA	Pourtales Radio Partnershi	337.2	51.94 Mi		117 17 46		449.0	1155	BPH950822IC

FCC Comment > Auxiliary facility

- Nearest CH 6 Grade B =KHQTV at 44.65 km